



AMERICAN PEANUT PRODUCT MANUFACTURERS, INC.  
ONE MASSACHUSETTS AVENUE, NW, STE. 800  
WASHINGTON, DC 20001 (202) 842-2345

---

July 1, 2005

Sent by E-mail to: [moab.docketclerk@usda.gov](mailto:moab.docketclerk@usda.gov)

Docket Clerk  
Marketing Order Administration Branch  
Fruit and Vegetable Programs  
Agricultural Marketing Service  
U. S. Department of Agriculture  
1400 Independence Avenue, S.W.  
STOP 0237  
Washington, DC 20250-0237

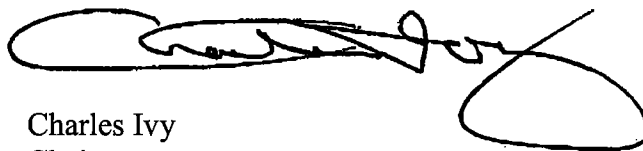
RE: Comments on Proposed Rule – Change in Minimum Quality Handling  
Standards for Domestic and Imported Peanuts Marketed in the United States;  
Docket Number FV05-996-2PR, June 21, 2005, Federal Register Vol. 70, No.  
118, pp. 35562-35565/

These comments are submitted on behalf of the American Peanut Product Manufacturers, Inc. (APPMI), a not-for-profit national trade association representing the companies that manufacture a majority of the peanuts produced in the United States into snack peanuts, peanut candy and peanut butter.

APPMI appreciates the opportunity to provide comments on USDA's proposed rule for "high moisture" grading of farmers stock peanuts. The proposed rule would change the peanut quality standards to require that domestic and imported peanuts be dried to 18% moisture or less prior to inspection and to 10.49% or less prior to storing or milling. We believe that the increase in the level of moisture content at inspection as recommended by the Peanut Standards Board will allow the industry the flexibility to develop new drying technologies, thereby increasing handling efficiencies and reducing costs to the peanut industry. Therefore, we support this proposed rule.

We are encouraged by the willingness of USDA to work through the many related issues necessary to coordinate this change and urge the Department to move expeditiously toward the issuance of a final rule.

Sincerely,



Charles Ivy  
Chairman